



Little Way Catholic
Educational Trust

Protection of Biometric Information Policy

Version:	1	
Approved by:	Trust Board	Date: Summer 2026
Next review due by:	Summer 2027	

Version	Updates
1	Original production

PART A

Application

This Little Way Catholic Educational Trust Procedure applies to the Little Way Catholic Educational Trust as a whole and to all the schools in the Trust, in accordance with and pursuant to the Data Protection Policy of the Little Way Catholic Educational Trust.

Little Way Catholic Educational Trust, including all the schools within the Trust, their Trustees, governors and staff, must abide by this Procedure.

This Procedure must be read in conjunction with the LWCET Data Protection Policy; all the terms of the LWCET Data Protection Policy apply to the interpretation and implementation of this Procedure; if there is any ambiguity or conflict the LWCET Data Protection Policy must be followed.

In implementing this Procedure, the Trust and its schools and staff, must take account of any advice or instruction given to them by the LWCET Data Protection Officer, the LWCET CEO or Board of Trustees.

If there is any question or doubt about the interpretation or implementation of this Procedure, the LWCET Data Protection Officer or LWCET CEO should be consulted.

Terminology

- The Trust means the Little Way Catholic Educational Trust (LWCET).
- School means a school within the Little Way Catholic Educational Trust
- Headteacher means the headteacher or principal of the school.
- CEO means the chief executive officer of the Little Way Catholic Educational Trust.
- Governing Body means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the school.
- LWCET Data Protection Officer currently means Gloucestershire County Council, Data Protection Traded Services.

Responsibilities

For the purposes of data protection legislation, the Little Way Catholic Educational Trust is the Data Controller, and can be contacted by writing to 'Little Way Catholic Educational Trust, Pure Offices, Hatherley Lane, Cheltenham, GL51 6SH

The LWCET Data Protection Officer is: Gloucestershire County Council, Data Protection Traded Services.

Email: schoolsdpo@gloucestershire.gov.uk

PART B

Introduction

Biometric data means personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.

The Little Way Catholic Educational Trust recognises that biometrics systems can be privacy intrusive.

The Little Way Catholic Educational Trust does not currently make use of any facial recognition data.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires more protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

This Procedure complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the guidance produced by the Information Commissioner.

The purpose of this Procedure is to regulate the management, operation and use of biometric data across the Trust.

An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics by using equipment that operates 'automatically' (i.e. electronically).

Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

'Processing' of biometric data includes obtaining, recording or holding the data or carrying out any operation or set of operations on the data including (but not limited to) disclosing it, deleting it, organising it or altering it.

As biometric data is special category data; in order to lawfully process this data, the Trust must have a legal basis for processing personal data and a separate explicit consent (which satisfies the fair processing conditions for personal data and special category data)

Purpose of Biometric Data

The Little Way Catholic Educational Trust doesn't collect or use any biometric data. If it was to, it would only be in order to provide education and associated functions, including for the following purposes:

- To enable the efficient operation of school canteen provision.

- To enable the efficient operation of a school library.

Consent and Withdrawal of Consent

In accordance with the Data Protection Policy, each school will notify staff, students and parents of how the school intends to use and process biometric data and seek their consent. Currently, as of June 2026, we do not use any.

If a member of staff, student or parent objects to the processing of their biometric data, the school will not be permitted to use the biometric data and will provide reasonable alternatives which will allow the student or staff member to access the same facilities that they would have had access to had their biometric data been used.

Staff, students and parents can also object at a later stage to the use of their biometric data. This should be in writing or by email to the Data Protection Officer, requesting that the school no longer uses the biometric data.

Storage of Biometric Data

If we were to use it, Biometric data would be kept securely, and systems will be put in place to prevent any unauthorised or unlawful access/use in accordance with the LWCET Data Protection Policy.

The biometric data would only be used for the purposes for which it was obtained, and such data will not be unlawfully disclosed to third parties.

Retention of Biometric Data

In accordance with the LWCET Data Retention Procedure, biometric data will only be stored by the school for as long as consent is provided.

If consent has been withdrawn, or once a student or staff member leaves, the biometric data will be deleted from the system within as soon as possible.